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From: Jon@hungertaskforce.org%inter2 [Jon@hungertaskforce.org]
Sent: Monday, August 08, 2005 11:17 AM
To: FarmBill
Subject: 2007 farm bill comments

Categories: Farm Bill
Attachments: tmp.htm; Farm Bill Testimony for August hearing (7-29-05).doc



tmp.htm (8 KB) Farm Bill Testimony
for August...

Attached are my comments regarding the 2007 Farm Bill. I am responding to the Federal Register notice dated June 17, 2005. Thank you.

Jon Janowski, Director of Advocacy

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August 4, 2005

Mike Johanns, Secretary
U.S. Department of Agriculture
1400 Independence Ave, S.W.
Washington, D.C. 20250

Dear Secretary Johanns:

As the 2007 Farm Bill process draws near, we are writing to restate our strong belief that the Food Stamp Program (FSP) must be preserved and expanded to meet the supplemental nutrition needs of low-income people.

As a food bank operating in Wisconsin's most populous county since 1974, we have seen first hand how poverty and hunger impact families. We provide emergency food to tens of thousands of people in Milwaukee County every month. Half of the people we serve are children. Many of the adults we serve are working. Yet, people continue to struggle, turning to charity to feed themselves and their families.

While there is no one solution that will improve the food security of our state's poorest residents, the Food Stamp Program is a substantial piece of the food security puzzle that must be preserved. In Wisconsin, the program currently serves 350,000 residents, including 140,000 people in Milwaukee County alone. This is the largest number of beneficiaries in state history. We consistently hear from food stamp beneficiaries how much the program means to them, particularly in light of higher-than-ever health care, child care, housing, and transportation costs.

In Wisconsin we have worked hard to inform eligible families where and how to apply for benefits. We have worked with Milwaukee County and the state on many collaborative ventures to improve access to the program, including coordination of EBT outreach, implementation of wireless EBT technology at farmers' markets, creation of an internet "self-screener," and placement of eligibility workers at community locations. In addition, we worked closely with state and local staff to implement many of the 2002 Farm Bill options that have benefited thousands of food stamp beneficiaries. Farm Bill policy options such as simplified reporting, transitional benefits, and year-long certifications have been implemented in Wisconsin and are significant program improvements.

Yet, there are federal statutory rules that unfairly deny food stamps to many low-income people in desperate need of food. In particular, legal immigrants and childless adults

unable to find employment continue to suffer extremely high levels of food insecurity and hunger. Regarding legal immigrants, there are still many who shy away from the program due to eligibility confusion. The effects of the 1996 welfare reform legislation still linger within the legal immigrant community. The 2002 Farm Bill restored FSP eligibility to many legal non-citizens, but we urge the USDA to strongly advocate for full legal immigrant eligibility and return to pre-1996 regulatory coverage.

Regarding the Able-Bodied Adults Without Dependent Children (ABAWD) population, in Milwaukee and other more rural counties, this population is extremely poor and faces huge barriers to employment. Current program requirements do not help ABAWD's find work. The 2002 Farm Bill did not simplify work requirements for the ABAWD population, making this another critical area of needed reform during the upcoming process. While we have worked with our state to take full advantage of existing waiver authority for this population, we strongly encourage the federal government to restore full eligibility and access to this group of people.

A major problem with the existing program benefit structure is that benefit levels have not kept pace with need. In Wisconsin, it is estimated that about one-quarter to one-third of food stamp beneficiaries receive the minimum allotment of \$10 per month. This is unacceptably low for households that are extremely poor. In 2001, we strongly advocated that the federal government improve the minimum benefit level to \$25, and we strongly advocate for this change again. Given Wisconsin's fractured administrative system, it is simply too great a hassle for a parent with children or an elderly individual to spend hours trying to obtain \$10 per month in benefits. Moreover, the minimum benefit level has been eroded by inflation over the years, making it virtually worthless. If the 2007 Farm Bill process results in only one positive change to the Food Stamp Program, we hope that it is an increase in the minimum benefit level.

Another major problem within the program is that the Thrifty Food Plan has become too thrifty over the years. The Thrifty Food Plan is not a reasonable estimate of what it costs to feed a family. According to this plan, a household of two adults and two young children can expect to spend about \$100 per week on food. In an urban area like Milwaukee, the actual cost of food for this household is much higher, especially when many food stamp beneficiaries spend their dollars at high-price corner stores. We have done research in Milwaukee which indicates that corner-store food items cost almost 25% higher than food sold at large supermarkets. We urge the USDA to reexamine the Thrifty Food Plan and increase the food cost benchmarks to better reflect existing food prices.

Another key component of a successful, accessible Food Stamp Program is funding. Starting with the Congressional budget resolution passed this past spring, we have heard arguments that food stamps might be targeted for funding cuts by the House and Senate Agriculture Committees. During these upcoming Congressional negotiations, we urge you to strongly advocate to decision-makers that food stamps be preserved. While the budget resolution clearly dictates that funding cuts be made, it is hard for us to understand how a supplemental nutrition program like food stamps could be disproportionately targeted for cuts while massive subsidy programs to large agricultural

interests are not. Food stamps provide about a \$1 benefit per meal. Our nation's priorities ought to start with how we can maintain and expand this meager allowance for our neediest citizens.

We also strongly urge you to advocate that the program's basic administrative and funding structure be maintained. There are congressional proposals to block grant the program and allow states broad statutory authority through the so-called "superwaiver" provision. These are the wrong policy options for the program. It is vitally important that the federal government retain a structure for this program that can respond to the needs of needy citizens. Block-grants and broader state waiver authority would disassemble this structure. The federal government needs to maintain its funding commitment to states, and maintain the existing policy options and waiver authority granted to states. Only by doing so will the Food Stamp Program continue to respond with flexibility to meet citizens' nutritional needs.

In terms of other specific policy options and simplifications, we advocate the following:

- Transitional Benefit options should be expanded from five months to six months
- Retain the existing structure around categorical eligibility and extend categorical eligibility to those who receive Medicaid benefits and the Part-D Medicare drug benefit
- Simplify the program's medical deduction without harming households that benefit significantly from this deduction
- Increase the asset limit from \$3,000 to \$5,000 for disabled and elderly individuals, and adjust this limit annually to account for inflation

As the 2007 Farm Bill process continues, we will continue to work with county, state, and federal officials to ensure that the Food Stamp Program is accessible to all eligible citizens. We thank you for your willingness to listen, and please do not hesitate to contact us if you have any questions.

Sincerely,

Jon Janowski
Director of Advocacy